

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION  
IN ADMIRALTY**

In the matter of the Complaint of Moran Environmental Recovery, LLC as the owner of the vessel “Miss June” and her engines, tackle, appurtenances, etc.

For exoneration from, or limitation of, liability

Civil Action No.: 2:18-cv-02396-DCN

**NOTICE OF REQUEST FOR  
PROTECTION FROM COURT  
APPEARANCES**

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**TO: GEDNEY M. HOWE, III, ESQUIRE AND A. ELLIOTT BARROW, JR., ESQUIRE,  
ATTORNEYS FOR CLAIMANT TIFFANY PROVENCE, ESQUIRE, PERSONAL  
REPRESENTATIVE OF THE ESTATE OF DAVID WAYNE RAFFERTY**

**CHRISTOPHER J. MCCOOL, ESQUIRE AND BROOKLYN O’SHEA, ESQUIRE,  
ATTORNEYS FOR CLAIMANT PENNY J. BARNETT, AS PERSONAL  
REPRESENTATIVE OF THE ESTATE OF EDWARD BARNETT**

Plaintiff-in-Limitation’s counsel, Paul F. Tecklenburg, seeks protection from court appearances in the within case for the following dates and reasons:

March 3 – 13, 2020	Attorney Tecklenburg will be out of the country on vacation
April 20 – 27, 2020	Attorney Tecklenburg will be out of state for a Tulane University conference and his son’s college event
May 2 – 11, 2020	Attorney Tecklenburg will be out of the state for his son’s graduation from Loyola University and additional travel

Plaintiff-in-Limitation’s counsel respectfully requests said protection be granted.

[SIGNATURE ON FOLLOWING PAGE]

**TECKLENBURG & JENKINS, LLC**

*s/ Paul F. Tecklenburg*

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Charleston, South Carolina

February 4, 2020